

DEPARTMENT OF WATER AND POWER

FOR INTRA-DEPARTMENTAL USE ONLY

January 21, 1982

ADVANCED PROJECTS,
ENVIRONMENTAL AND
REGULATORY AFFAIRS GROUP

Mr. James H. Anthony
Project Director
Intermountain Power Project
931 General Office Building

JAN 21 1982

IPP Stack Height

This confirms a telephone conversation between Mr. N. F. Bassin of the Mechanical Engineering Section and Mr. J. M. Hayashi of the IPP Project Office concerning a meeting between Mr. Bassin and APERA personnel on January 6, 1982. It was decided, and Mr. Hayashi concurred, that a reduction in stack height is not recommended at this time. However, as Item 3 of "Commitments/Agreements" of the attached "Record of Conference/Conversation" indicates, an increase in stack height may, in fact, be advisable.

Mr. Hayashi was also informed that Mr. S. A. Clark will contact Mr. B. Campbell by January 12, 1982 to advise him of the calculated increase in stack height and to request a legal opinion of further action that may be required.

ORIGINAL
SIGNED BY
L. J. WEIDNER
G

L. J. WEIDNER
Manager
Mechanical Engineering Section

MGW:vg

Attachment

cc: w/Attachment
H. L. Holland
J. M. Hayashi
B. Campbell
Robert C. Burt
H. J. Christie
Patrick P. Wong (2)
M. J. Nosanov
S. A. Clark
T. L. Conkin
L. J. Weidner (4)
N. F. Bassin
M. G. Weiss

IP11_001978

Revised 12/4/81

PARTICIPANT/ATTENDANCE

AFFILIATION/PHONE

PROJECT IPP

S. A. Clark

APERA 3235

MEP-AFE

T. L. Conkin

APERA 4845

FILE

N. F. Bassin

MES 4637

DATE 1/ 6/82 TIME

PLACE GOB

TELEPHONE MEETING X

SUBJECT/PURPOSE: To discuss the possibility of reducing IPP stack height by 40 feet.

DISCUSSION: Black & Veatch (B&V) has indicated the possibility of reducing stack height by 40 feet and saving approximately \$1.5 million in stack costs.

COMMITMENTS/AGREEMENTS:

Assigned Due Date

1. Current permits are based on a stack height of 710 feet calculated from the "Good Engineering Practice" (GEP) stack height equation.
2. Dispersion modeling has confirmed that the emissions from that stack height will be within the PSD increments.
3. Reduction in stack height below 710 feet would be questionable unless the independent variables of the GEP stack height formula have changed to result in a lower calculated GEP height. (A quick check by TLC indicates that due to increased generation building height, the GEP stack height is now approximately 760 feet, 50 feet higher than the permit GEP height).
4. Our modeling of our present estimated emissions indicates that we are at 67 percent of the 24 hour SO₂ PSD increment. (Continued on Page 2)

CONCLUSIONS/ACTIONS: 1. We should reserve requests for permit changes to more significant items.

2. Mr. Bassin will inform the Project Office of the discussion and conclusion regarding reduction of stack height. (Continued on Page 2)

NFB

1/6/82

NFB:lje

cc: S. A. Clark
T. L. Conkin

PREPARED BY: N. F. Bassin

DATE: 1/6/82

IP11_001979

COMMITMENTS/AGREEMENTS (Cont.)

- 4a. We would like to maintain a margin above our modeling values because:
- (1) Actual measurements at the site may indicate higher emission levels because the modeling is not accurate.
 - (2) We may have to approach EPA and Utah on other matters of greater significant (e.g., fugitive dust for coal handling).
 - a. It is advisable to save what goodwill may exist for more significant items.
 - b. Reducing stack height will decrease the margin of safety on the PSD increment.
5. Repeated requests for changes to the permits could jeopardize the permit.

CONCLUSIONS/ACTIONS (Cont.)

3. Mr. Clark will contact Bruce Campbell of the Project Office and inform him of the calculated increase in stack height, and request a legal opinion of what further action may be required.

SAC
1/12/82